

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

UNITED STATES OF AMERICA and)
THE STATE OF WISCONSIN,)
Plaintiffs,) Civil Action No. 10-C-910
v.) Hon. William C. Griesbach
NCR CORPORATION, *et al.*)
Defendants.)

)

**DECLARATION OF SHARON DUNHAM IN SUPPORT OF PLAINTIFFS' UNITED
STATES AND THE STATE OF WISCONSIN'S OPPOSITION TO MENASHA
CORPORATIONS MOTION TO COMPEL ADDITIONAL DISCOVERY**

I, Sharon Dunham, declare as follows:

1. I am an employee of The Boldt Company ("Boldt"), which has a contract with the Wisconsin Department of Natural Resources ("WDNR") to provide technical support to WDNR and the United States Environmental Protection Agency ("EPA"), in their oversight of clean up and remedial work for the Fox River Superfund Site (the "Project").
2. I have been an employee of Boldt since July 30, 2001. Boldt has been working under a WDNR contract for the Project since 2004.
3. I am a Project Administrator for Boldt and my primary responsibility is records management for the Boldt records in connection with the Project. I also perform most administrative tasks for the Agencies/Oversight Team ("A/OT").
4. I maintain the electronic files of the information that comes to Boldt regarding the Project, and have since mid-2004.

5. Boldt is the leader of the A/OT, which also includes employees of WDNR, EPA, and environmental consultants under contract to Boldt.

6. As a member of the A/OT, Boldt has been involved in the oversight of the design and implementation of the remedy for Operable Units 2-5 since mid-2004.

7. The A/OT has weekly internal meetings to discuss Remedial Action Work Plans, the design of the Remedial Action, the implementations of the remedy, and other issues related to the Fox River Site. I attend these meetings, take notes of the meetings, and load those notes into our file structure. If I am not able to attend the meetings, the meeting is recorded for use to write notes later, and the notes are uploaded into the file structure.

8. The A/OT also has meetings with the Design Team, currently led by TetraTech, a contractor for Fox River LLC, who is responsible for completion of the remedial design and has been implementing the remedial action. After these meetings TetraTech circulates notes from the meetings and I upload those notes into our file structure. During the remedial action season, the A/OT has weekly meetings with Fox River LLC's contractors, including TetraTech, regarding information related to the implementation of the remedy at the Fox River.

9. When any employee of Boldt who is working on the Project receives an email with attachments, I download those attachments into an electronic file structure that I maintain. Since approximately 2005, I have also included the transmittal email for the attachment in our file structure for formal document submittals.

10. When any employee of Boldt who is working on the Project sends an email with attachments, I download those attachments into the electronic file structure that I maintain. Since approximately 2005, I have also included the transmittal email for the attachment in our file structure for formal document/comment submittals.

11. Since approximately 2005, I have also often added emails to the file structure when the email contains a large volume of substantive comments.

12. If an employee of Boldt receives a compact disc or other storage device for electronic documents, I download those documents into our electronic records file structure.

13. The file structure contains all electronic documents, with the exception of email, that have been sent to or sent by Boldt in connection with its involvement in the Project.

14. I have provided the United States Department of Justice a complete copy of our electronic documents in response to the discovery requests in this case.

15. I have searched our records and attempted to estimate the approximate volume of emails that the employees of Boldt have related to the Project. To the best of my abilities, I estimate that Boldt has approximately 80,000 emails related to the Project.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 13, 2012

s/ *Sharon Dunham*
Sharon Dunham

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused a true and correct copy of the foregoing Declaration to be served on counsel of record via e-mail to:

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Dated: September 17, 2012

s/ Randall M. Stone